

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA	)	CRIMINAL NO. 2:02cr
	)	
v.	)	<b>UNDER SEAL</b>
	)	
EARL ADOLPHUS ALLEYNE	)	21 U.S.C. § 846
(Counts 1, 28, 30, 31, 32,	)	Conspiracy to Distribute and
132, 138, 140, 142,	)	Possess with Intent to Distribute
147, 151, 160, 167,	)	Marijuana
176, 202, 205, 222)	)	(Count 1)
	)	
STANFORD LYNDEN ARTHUR	)	21 U.S.C. § 848(a) and (c)
(Counts 1, 28, 30, 31, 32	)	Continuing Criminal Enterprise
182, 185)	)	(Count 2)
	)	
MARLON BENJAMIN	)	18 U.S.C. § 1956(h)
a/k/a "Rapid"	)	Conspiracy to Promote and Conceal
(Counts 1, 3, 34, 35, 41,	)	Marijuana Trafficking by Laundering
332, 346, 350, 351,	)	Marijuana Proceeds using Monetary
354, 356, 359, 368,	)	Instruments
372, 375, 383, 391, 396)	)	(Count 3)
	)	
KEVIN MARCEL BOONE	)	21 U.S.C. §§ 841(a)(1) and (b), 846
a/k/a "Neighbor"	)	Attempt, and Possession,
(Counts 1, 32, 34, 144	)	with Intent to Distribute Marijuana
145, 146, 190)	)	(Counts 4-37)
	)	
KAREN ELIZABETH BUCKNOR	)	21 U.S.C. § 843(b)
a/k/a "Buckers"	)	Use of Communication Facilities
(Counts 1, 2, 3, 8 through 25,	)	To Further The Marijuana Conspiracy
27 through 37,	)	and the CCE
217 through 222)	)	(Counts 38-216)
	)	
SIMEON GARGGON CHARLES	)	18 U.S.C § 924(c)(1)
a/k/a "Lion"	)	Possession of Firearms in Furtherance
(Counts 1, 2, 3, 8 through 25,	)	of, and Using and Carrying
27 through 37, 50, 72, 78	)	Firearms During and In Relation to
81, 82, 84, 101, 108, 116	)	Drug Trafficking Crimes
118, 124, 134, 137, 143,	)	(Counts 217-222)
148, 150, 152, 157, 158,	)	
161, 162, 163, 166, 186,	)	

187, 189, 203, 206, 213,	)	
217 through 222)	)	
	)	
STEPHANIE ANTIONETTE DEERING	)	18 U.S.C. § 1956(a)(1)(A)(i)
(Counts 1, 3, 248, 291, 296, 309)	)	Promotion of Marijuana Trafficking
	)	Through Money Laundering
JANE DOE ONE	)	(Counts 223-402)
a/k/a "Vimalam Delaney"	)	
a/k/a "V"	)	21 U.S.C. § 853, 18 U.S.C. § 982
a/k/a "Vimalam Lakami Ananda	)	Criminal Forfeiture
Hamilton Delaney"	)	
(Counts 1, 34, 35, 36, 37)	)	
	)	
ANTHONY DELGADO	)	
(Counts 1, 33, 34, 209)	)	
	)	
SEQUOYA MARY DENNIS	)	
a/k/a "Pumpkin"	)	
(Counts 1, 3, 21, 22, 30, 31,	)	
105, 259, 262, 265,	)	
266, 269, 271, 272,	)	
275, 276, 281, 283,	)	
285, 286, 295, 301,	)	
305, 307, 312, 317,	)	
321, 330, 345)	)	
	)	
ANDREW PAUL DOWNIE	)	
a/k/a "UPS"	)	
a/k/a "Phillip Richard Gayle"	)	
a/k/a "Todd"	)	
(Counts 1 through 25,	)	
27 through 37,	)	
40, 42, 52, 55, 56, 57,	)	
58, 60, 62, 63, 64,	)	
67, 68, 70, 71, 72,	)	
74, 79, 80, 82, 87,	)	
88, 89, 92, 93, 95, 96,	)	
98, 103, 104, 109,	)	
112, 121, 126, 127,	)	
129, 131, 132, 141, 159,	)	
164, 168, 172, 184, 188	)	
193, 195, 196, 200,	)	
217 through 402)	)	
	)	
JULIUS NIGEL FREDERICKS	)	
a/k/a "Mike Williams"	)	

a/k/a "Mike Francis"	)
(Counts 1 through 4, 7 through 402)	)
	)
OMAR LEE GRANT	)
(Counts 1, 33, 34, 192, 208,	)
216)	)
	)
MARLO ANNE HENRY	)
(Counts 1, 3, 341, 342, 349,	)
353, 358, 363, 365,	)
373, 376, 382, 385)	)
	)
STANLEY ALPHONZO HURT	)
(Counts 1, 27, 117, 129, 135,	)
136)	)
	)
TONDA ANN JAMES	)
(Counts 1, 12, 220)	)
	)
ANNETTE PATRICE LANE	)
(Counts 1, 3, 23, 25, 27, 51	)
59, 65, 66, 69, 73,	)
76, 83, 85, 86, 90,	)
91, 94, 102, 106, 122,	)
159, 180, 225, 234,	)
235, 247, 273, 274,	)
278, 284, 319, 324,	)
360, 370, 379, 388)	)
	)
NICOLE R. MINER	)
(Counts 1, 3, 18, 27, 33, 34,	)
130, 133, 178, 194,	)
197, 198, 204, 210,	)
211, 212, 216, 224,	)
236, 246, 250, 334,	)
339, 340, 389, 394,	)
401)	)
	)
AUTHORO OSMOND OSBOURNE	)
a/k/a "Tall Man Johnny"	)
a/k/a "Author Osbourne"	)
a/k/a "Johnny-Nine"	)
(Counts 1, 3, 24, 25, 29, 37,	)
97, 99, 100, 107,	)
113, 139, 149, 154,	)

156, 170, 171, 293,	)
304, 305)	)
	)
KENYA PRINCE CHUNCEY PURNELL	)
a/k/a "Moses"	)
(Counts 1, 3, 21, 22, 23, 24,	)
25, 39, 68, 71, 125, 165,	)
173, 175, 181, 207, 222)	)
	)
BARBARA LAVETTE RIDDICK	)
a/k/a "Barbie Lavette Riddick"	)
a/k/a "Lynette"	)
(Counts 1, 3, 33, 61, 75, 174,	)
177, 179, 191, 198, 237,	)
238, 239, 240, 241, 242,	)
243, 244, 245, 249, 251,	)
252, 253, 254, 257, 260,	)
261, 263, 264, 267, 268,	)
270, 277, 279, 280, 287,	)
288, 289, 290, 292, 294,	)
297, 298, 299, 300, 303,	)
306, 308, 310, 316, 318,	)
322, 325, 327, 329, 333,	)
336, 339, 355, 362, 369,	)
386, 395, 399)	)
	)
NAKIA KENYATA SANDERLIN	)
(Counts 1, 3, 34, 35, 43, 45,	)
46, 47, 48, 49, 53, 54,	)
111, 153, 198, 199, 348,	)
361, 364, 367, 374, 384,	)
392, 397, 400)	)
	)
CASEY RICARDO SERVICE	)
a/k/a "Dooka"	)
a/k/a "Ricky"	)
(Counts 1, 34, 35, 36, 37, 221)	)
	)
SHAUN ALISTER TYSON	)
(Counts 1, 26, 110, 119, 120,	)
123)	)
	)
SHEILA WALLER	)
(Counts 1, 3, 337, 343, 347,	)
352, 357, 366, 371,	)

402)	)
	)
LAWANDA MARIE WHITE	)
(Counts 1, 3, 5, 6, 7, 8, 10,	)
11, 12, 13, 14, 16,	)
215, 219, 223)	)
	)
ANTONIO JERMAINE WYATT	)
a/k/a "Tone"	)
(Counts 1, 22, 28, 29, 30, 31,	)
32, 34)	)

# INDICTMENT

JULY TERM 2002 - at Norfolk, Virginia

## COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about June 1999, the exact date to the grand jury being unknown, continuing to in about or about July 2002, in the Eastern District of Virginia and elsewhere, the following 27 defendants:

EARL ADOLPHUS ALLEYNE,  
 STANFORD LYNDEN ARTHUR,  
 MARLON BENJAMIN a/k/a "Rapid",  
 KEVIN MARCEL BOONE, a/k/a "Neighbor",  
 KAREN ELIZABETH BUCKNOR, a/k/a "Buckers",  
 SIMEON GARGGON CHARLES, a/k/a "Lion",  
 STEPHANIE ANTOINETTE DEERING,  
 JANE DOE ONE, a/k/a "Vimalam Delaney", "V" and "Vimalam Lakami Ananda  
 Hamilton-Delaney",  
 ANTHONY DELGADO,  
 SEQUOYA MARY DENNIS, a/k/a "Pumpkin",  
 ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
 JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
 OMAR LEE GRANT,  
 MARLO ANNE HENRY,  
 STANLEY ALPHONZO HURT,  
 TONDA ANN JAMES,  
 ANNETTE PATRICE LANE,

NICOLE R. MINER,  
AUTHOR OSMOND OSBOURNE, a/k/a "Tall Man Johnny", "Author Osbourne", and  
"Johnny-Nine",  
KENYA PRINCE CHUNCEY PURNELL, a/k/a "Moses",  
BARBARA LAVETTE RIDDICK, a/k/a "Barbie Lavette Riddick" and "Lynette",  
NAKIA KENYATA SANDERLIN,  
CASEY RICARDO SERVICE, a/k/a "Dooka" and "Ricky",  
SHAUN ALISTER TYSON,  
SHEILA WALLER,  
LAWANDA MARIE WHITE, and  
ANTONIO JERMAINE WYATT, a/k/a "Tone",

did, unlawfully, knowingly and intentionally combine, conspire, confederate and agree together, with each other, and with other persons both known and unknown to the grand jury, to commit the following offenses against the United States:

1. To knowingly, intentionally and unlawfully possess with the intent to distribute 1000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2; and
2. To knowingly, intentionally and unlawfully distribute 1000 kilograms or more of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and Title 18, United States Code, Section 2.

#### THE COMMON WAYS, MANNER AND MEANS

##### 1. The General Nature and Purpose of the Criminal Enterprise

The defendants and co-conspirators transported quantities of marijuana, in interstate and foreign commerce, from Mexico and California to New York, New Jersey Maryland, Virginia, and other places, for the purpose of distribution within the Eastern District of Virginia and elsewhere. This indictment focuses on the California to Virginia

marijuana distribution structure and those involved directly or indirectly with supplying marijuana to Virginia.

The purpose of the conspiracy was two-fold: to make easy money and to supply the demands of the drug marketplace generated by the ultimate users.

The defendants and co-conspirators met at various times and places to package controlled substances, using paraphernalia, to deliver packages of controlled substances, and to receive the proceeds from the sales of the controlled substances.

The defendants and co-conspirators would and did perform certain duties and had certain responsibilities and roles in the conspiracy, some of which were interchangeable at various times throughout the conspiracy.

The defendants and co-conspirators derived income from the distribution of controlled substances, and spent the money earned from the sale of controlled substances in ways which furthered and promoted the conspiracy.

## 2. The California Conspirators

Co-conspirators based in California included, but were not limited to, defendants BUCKNOR, DOWNIE, JANE DOE ONE, and SERVICE (hereinafter "the California defendants"). Defendants BUCKNOR and DOWNIE organized, lead, managed, orchestrated, and ran a nation-wide marijuana distribution network based in California with branches in New Jersey, New York, Florida, and Virginia.

### 3. The Virginia Conspirators

The Virginia Conspirators included, but were not limited to, defendants ALLEYNE, ARTHUR, BENJAMIN, BOONE, CHARLES, DEERING, DENNIS, FREDERICKS, HENRY, HURT, JAMES, LANE, MINER, OSBOURNE, PURNELL, RIDDICK, SANDERLIN, TYSON, WALLER, WHITE, and WYATT (hereinafter “the Virginia defendants”). Defendants FREDERICKS and CHARLES organized, lead, managed, and orchestrated the operations in Virginia.

### 4. The Communication Facilities

All the defendants, including defendants BUCKNOR, CHARLES, DOWNIE and FREDERICKS, utilized communications devices, including telephones, cellular phones, electronic pagers, and computer modems, to accomplish their goals.

### 5. The California Operation

Orders for marijuana were placed by defendant FREDERICKS in Virginia. Defendant FREDERICKS, or CHARLES, would provide defendant DOWNIE with so-called “flag” addresses to which the marijuana would be sent. A “flag” address was a location where a co-conspirator could sign for and receive a package, yet need not live there.

The California defendants would secure marijuana from an unknown source of supply. The California defendants maintained a stash house where they stored and packaged marijuana. The California defendants compressed the marijuana and then packaged it using layer upon layer of wrappings to minimize the chance of detection by law enforcement officials. Each layer was treated with odor masking substances.

Once the marijuana was packaged, the California defendants met for pre-delivery planning at public places, including a McDonald’s restaurant. Pre-delivery planning was



necessary to avoid of detection by law enforcement and theft of the marijuana by competitors.

The California defendants would then ship the packages via a commercial mail service, including United Parcel Service, Federal Express, and Airborne Express (hereinafter “the commercial mail locations”), to flag addresses provided by defendant FREDERICKS. The names on the packages were fictitious to avoid detection. Notwithstanding, the Virginia defendants present at the flag houses were able to sign for and receive the packages.

The California defendants rented minivans to transport the packages of marijuana. To avoid surveillance, minivans would only be rented for contract terms of about one month.

Generally, the California defendants would transport packages of marijuana from the stash house to the commercial mail locations in two vehicles, one trailing the other. To counter possible surveillance by law enforcement, the California defendants would take circuitous routes to their destinations and would use the trailing vehicle to block the entrance ramps to the interstates.

The California defendants used multiple commercial mail locations in a small geographical radius. This ensured that packages were shipped by different companies and drivers. Further, it allowed the defendants to efficiently ship packages with as little time on the road and exposure to law enforcement as possible.

The California defendants scheduled their drop-offs at the commercial mail locations for shortly before the afternoon pickup. When the California defendants arrived at the commercial mail locations, they methodically backed the minivan carrying the packages

of marijuana into the loading bays to avoid law enforcement surveillance. Once the California defendants dropped off a package at a commercial mail location, they would track it online to its final destination using “www.ups.com” and “www.fedex.com.”

6. The Virginia Distribution Operation

The vast majority of the boxes were successfully delivered to their destination at flag houses in Virginia. The flag houses used in the Eastern District of Virginia included, but were not limited to:

1455 Bayhead Drive, Apt 1642, Virginia Beach, Virginia  
842 C Avenue, Apt 5, Norfolk, Virginia  
1666 Hunter Street, Norfolk, Virginia  
1344 Godfrey Lane, Norfolk, Virginia  
9261 Marlow Avenue, Norfolk, Virginia  
2734 Tidewater Drive, Norfolk, Virginia  
2912 Earls Court Avenue, Norfolk, Virginia  
3120 Westminster Avenue, Norfolk, Virginia  
539 W. 36<sup>th</sup> St., Apt. 3, Norfolk, Virginia  
407 Ashlawn Drive, # 2, Norfolk, Virginia  
1352 Longdale Drive, Norfolk, Virginia  
1324 MacDonald Road, Apartment B, Chesapeake, Virginia  
Royal Automotive and Paint, 912 High Street, Portsmouth, Virginia

Virginia defendants waiting outside these addresses would sign for the packages, receive them, and provide them to defendants FREDERICKS and CHARLES. From that point, defendants FREDERICKS and CHARLES assumed control of the marijuana distribution operation in the Eastern District of Virginia.

7. The Repackaging Operation

\_\_\_\_\_ Shortly after receiving the packages of marijuana, defendants FREDERICKS and CHARLES transported them to another location, often a hotel or a stash house. Some of

the houses and hotels used in the Eastern District of Virginia included, but were not limited to:

1122 City Hall Avenue, Norfolk, Virginia;  
6590 Stoney Point North, Norfolk, Virginia;  
4731 Teal Duck Court, Virginia Beach, Virginia;  
Ramada Inns in Norfolk and Virginia Beach, Virginia;  
2005 Pershing Avenue, Norfolk, Virginia.

At the hotel or stash house, the Virginia defendants broke down the package into smaller increments for sale. The Virginia defendants repackaged the marijuana quickly and took careful steps to remove the tracking numbers and mailing labels and dispose of them separately from the boxes which invariably contained marijuana residue.

The defendants and co-conspirators used residences to store, possess with intent to distribute and distribute controlled substances, and to store money and other proceeds derived from the distribution of controlled substances.

The marijuana was sold to a loyal group of co-defendants and co-conspirators who sold it to users on the street. Defendant CHARLES oversaw and managed the street distribution of the marijuana.

8. The Gross Profits Generated and the Money Sent to California

Once defendants CHARLES and FREDERICKS collected the money from the street sale of marijuana, defendant FREDERICKS and other co-conspirators divided the money into increments of less than \$10,000. Defendant FREDERICKS then contacted and instructed co-conspirators to wire a portion of the money back to California. Defendant FREDERICKS paid defendant DOWNIE \$365 per pound of marijuana.

At defendant FREDERICKS' direction, defendants DENNIS, DEERING, LANE, MINER, PURNELL, RIDDICK, SANDERLIN, WALLER and others sent and received wire

transfers and money orders at Western Union stores. Often, they wired money to California to fictitious names. However, the Virginia defendants sending the wire transfers dutifully recorded the Western Union wire tracking numbers. Defendant FREDERICKS and other Virginia defendants notified defendant DOWNIE of the Western Union wire tracking numbers. This enabled defendant DOWNIE and other California defendants to retrieve the money wired regardless of the name used as the addressee.

From January 2000 until May 2002, Western Union wires transfers and money orders totaling approximately \$1,392,379 were sent from Virginia to California. At \$365 per pound of marijuana, this corresponds to payment for approximately 3,815 pounds of marijuana shipped from California to Virginia during that time.

Defendants FREDERICKS and CHARLES sold the marijuana on the street in Virginia for approximately \$700 to \$800 per pound. At this price, they generated approximately twice the amount of money wired, or about \$2,784,758 in gross profits.

9. The Evasion of Law Enforcement and Organizational Flexibility

During the course of the conspiracy, defendants DOWNIE and FREDERICKS learned law enforcement surveillance techniques, closely monitored the schedules and practices of the commercial mail delivery services, and remained flexible in their operations in a concerted effort to avoid detection. The defendants employed the following techniques to avoid detection:

a. Use and Changing of Cell Phones

The ability to communicate was essential to the ability of the nationwide organization to function. The defendants' primary tool was the cellular telephone. The defendants not only used the cellular telephone to arrange shipments of marijuana and wire transfers of

money, but also to conduct counter-surveillance and evade detection. In particular, the defendants purposely used NEXTEL cellular phones (which have a “walkie-talkie” feature) in an effort to frustrate law enforcement monitoring.

In the time period from February 25, 2002, until April 25, 2002, defendant FREDERICKS placed or received over 8,000 phone calls, of which 640 related to pertinent drug distribution and money laundering activity.

After using a particular cellular telephone number for a while, defendants routinely dropped the phone, changed the telephone number, or subscribed to new phones using other people names in order to evade monitoring and detection. Often such changes occurred after the periodic interdiction of marijuana shipments by law enforcement and arrests of co-conspirators.

b. Using Coded Language Over the Phone

The defendants spoke in code during discussions on the telephone to evade detection. For instance, the defendants never used the words “marijuana” or “money” on the telephone. Rather, the defendants would refer to marijuana as “food” and monetary amounts only as single numbers (e.g., six thousand dollars was reduced simply to “six”).

c. Re-routing shipments

Periodically, defendant DOWNIE would arrange for the Virginia defendants to receive marijuana shipments from defendants DELGADO, GRANT and OSBOURNE in New York and New Jersey, rather than directly from the California defendants. Defendant OSBOURNE would travel from New York/New Jersey to Virginia via the Eastern Shore to deliver marijuana. This alternative means of importing marijuana into Virginia helped the defendants evade detection by Virginia-based law enforcement authorities monitoring

commercial mail shipments into the state.

d. Changing Shipping Methods

Periodically, large amounts of marijuana were sent via Piedmont Aviation, with the assistance of defendants HURT and TYSON, who were employees of Piedmont. This method, however, became less practicable for the defendants after the events of September 11, 2001 due to increased security at the airports.

e. Changing Flag Houses and Repackaging Locations

Flag houses and repacking locations were changed frequently to avoid detection. Further, the defendants rented motel rooms to repackage marijuana in order to avoid detection.

f. Recruiting defendants and co-conspirators

The ability of the organization to sustain itself was predicated on the ability of defendants DOWNIE, FREDERICKS and CHARLES to recruit new co-conspirators into the organization when others were arrested by law enforcement. During the period from June 1999 until July 2002, a large number of people joined the marijuana distribution conspiracy and assisted in various ways.

g. Using aliases and false identities

The defendants used fictitious names, aliases, and identities to avoid detection by law enforcement.

OVERT ACTS

Between in or about June 1999 and continuing through in or about July 2002, the exact dates being unknown to the grand jury, in the Eastern District of Virginia and elsewhere, in furtherance of marijuana conspiracy, and in order to carry out the objects

thereof, the defendants and unindicted co-conspirators committed the following overt acts, among others:

1. On June 26, 1999, a box containing approximately 10 pounds of marijuana was shipped, by United Parcel Service (UPS) Next Day Service, from Cerritos, California, to C. Moses, at 1455 Bayhead Drive, Apartment 1642, Virginia Beach, Virginia.

2. On September 22, 1999, three boxes each containing approximately 14 pounds of marijuana were shipped from the AIM Mail Center, 1029 Firestone Boulevard, Norwalk, California, to 1712 Melon Street, Norfolk, Virginia and 1125 Jernigan Avenue, Norfolk, Virginia.

3. On September 23, 1999, at 1712 Melon Street, Norfolk, Virginia, defendant FREDERICKS signed the name of M. Williams and received the FEDEX shipment from the AIM Mail Center, 1029 Firestone Boulevard, Norwalk, California.

4. On January 2, 2000, at various 7-Eleven stores in the Tidewater Area, defendants FREDERICKS and WHITE were videotaped purchasing Western Union money orders.

5. On January 3, 2000, at the FEDEX Facility, in Norfolk, Virginia, a package addressed to 10929 Firestone Boulevard, Apartment Number 215, Norwalk, California, and containing twenty-seven (27) blank Western Union money orders totaling \$13,500 (in increments of \$500) arrived.

6. On February 25, 2000, at the UPS Facility, Norfolk, Virginia, a package sent from the AIM Mail Center, 10929 Firestone Boulevard, Norwalk, California, addressed to 842 C Avenue, Apartment 5, Norfolk, Virginia, and containing approximately 12.5 pounds of marijuana, arrived.

7. On February 25, 2000, at 1666 Hunter Drive, Norfolk, Virginia, an unindicted co-conspirator attempted to receive a box of marijuana.

8. On February 25, 2000, at 1666 Hunter Drive, Norfolk, Virginia, an unindicted co-conspirator possessed firearms.

9. On February 25, 2000, at the UPS Facility, Norfolk, Virginia, an unindicted co-conspirator possessed the box which contained 12.5 pounds of marijuana shipped from the AIM Mail Center, 10929 Firestone Boulevard, Norwalk, California to 842 C Avenue, Apartment 5, Norfolk, Virginia,

10. On February 25, 2000, an unindicted co-conspirator possessed a box of marijuana, \$1,552 in United States Currency, and a number of Western Union receipts for money orders (totaling more than \$15,000) that had been sent to Los Angeles, California.

11. On February 25, 2000, at Virginia Beach, Virginia, an unindicted co-conspirator possessed approximately two pounds of marijuana, two UPS boxes, receipts for Western Union wire transfers, drug ledgers, a scale, and a 9mm semi-automatic pistol.

12. On February 26, 2000, at 1122 City Hall Avenue, Norfolk, Virginia, defendants CHARLES, FREDERICKS and WHITE possessed approximately 14 pounds of marijuana, three firearms, currency, and Western Union records for money wired to California.

13. On February 26, 2000, six boxes containing approximately 80 pounds of marijuana shipped from the AIM Mail Center, 10929 Firestone Boulevard, Norwalk, California, and addressed to 2734 Tidewater Drive, 1344 Godfrey Lane, 2915 Marne Avenue, 215 Ridgewell Circle, 9261 Marlow Avenue (the residence of defendant JAMES), Norfolk, Virginia, and 1009 Melton Street, Chesapeake, Virginia, arrived at the FEDEX and



UPS facilities in Norfolk, Virginia.

14. On February 28, 2000, at 9261 Marlow Avenue, Norfolk, Virginia, defendant JAMES possessed a firearm.

15. On May 4, 2000, two boxes sent from the AIM Mail Center, Norwalk, California, addressed to 2912 Earls Court Avenue, Norfolk, Virginia and 1324 McDonald Road, Apartment B, Chesapeake, Virginia (the residence of defendant MINER), and containing approximately 31 pounds of marijuana each, arrived at the Airborne Express facility in Virginia Beach, Virginia.

16. On May 17, 2000, a box shipped from the Village Mail Call, Inc., Los Angeles, California to 3120 Westminster Avenue to Norfolk, Virginia, and containing approximately 12 pounds of marijuana, arrived at the UPS facility in Norfolk, Virginia.

17. On June 7, 2000, two boxes shipped from Mail Plus in Los Angeles, California, addressed to 539 W. 36<sup>th</sup> Street, Apartment #3, Norfolk, Virginia, and containing approximately 11 pounds and 10 pounds of marijuana, respectively, arrived at the UPS and FEDEX facilities in Norfolk, Virginia.

18. On July 5, 2001, defendant BUCKNOR signed a lease to a pager with Action Paging II, 7916 Norwalk Boulevard, Whittier, California, which was used by defendant DOWNIE.

19. On January 30, 2002, defendant FREDERICKS received a box from defendant PURNELL at the Super Spray Car Wash at the 7900 Block of Chesapeake Boulevard in Norfolk, Virginia.

20. On January 30, 2002, defendant FREDERICKS drove in a van to defendant DENNIS' home at 6590 Stoney Point North, Norfolk, Virginia.

21. On January 30, 2002, defendant FREDERICKS drove in a van to 4731 Teal Duck Court, Virginia Beach, Virginia and carried a bag into the apartment of defendant WYATT.

22. On January 30, 2002, defendant FREDERICKS drove in a van back to 6590 Stoney Point North, Norfolk, Virginia.

23. On February 6, 2002, defendant PURNELL rented room 154 at the Ramada Inn, Northampton Boulevard, Virginia Beach, Virginia.

24. On February 6, 2002, defendants FREDERICKS and PURNELL met at the Ramada Inn on Northampton Boulevard in Virginia Beach, Virginia.

25. On February 6, 2002, defendant PURNELL left Room 154 at the Ramada Inn and purchased green and white garbage bags from a local Farm Fresh Supermarket.

26. On February 6, 2002, defendant FREDERICKS exited Room 154 at the Ramada Inn carrying full white and green garbage bags.

27. On February 6, 2002, defendant FREDERICKS drove to 4731 Teal Duck Court, Virginia Beach, Virginia, and dropped off a full white garbage bag inside the home of defendant WYATT.

28. On February 6, 2002, defendant FREDERICKS returned to Room 154 at the Ramada Inn.

29. On February 6, 2002, defendant PURNELL abandoned packaging material with the lingering odor of perfume, packing peanuts, and small red rubber bands inside Room 154 of the Ramada Inn.

30. On February 20, 2002, defendant PURNELL met defendant FREDERICKS at 849 Bancker Road in Norfolk, Virginia.

31. On February 20, 2002, defendant PURNELL transferred a brown box from his car to defendant FREDERICKS' van.

32. On February 20, 2002, defendant FREDERICKS, after leaving defendant DENNIS' residence, discarded two brown boxes containing packing material, marijuana residue, and partially removed UPS shipping stickers into a dumpster at the Mayfair Apartment complex in Norfolk, Virginia.

33. On February 21, 2002, defendant FREDERICKS entered the Checks Cashed store, an authorized Western Union outlet, on Sewells Point Road in Norfolk, Virginia.

34. On February 21, 2002, defendant FREDERICKS exited the Checks Cashed store, an authorized Western Union outlet, on Sewells Point Road in Norfolk, Virginia carrying Western Union wire forms.

35. On February 27, 2002, defendant FREDERICKS and a co-conspirator drove in a van to the Ramada Inn located on East Ocean View Avenue and Chesapeake Boulevard in Norfolk, Virginia.

36. On February 27, 2002, defendant FREDERICKS rented Room 124 at the Ramada Inn on East Ocean View Avenue and Chesapeake Boulevard in Norfolk, Virginia.

37. On February 27, 2002, defendant FREDERICKS and an unindicted co-conspirator loaded full plastic bags into the rear of a van.

38. On February 27, 2002, defendant FREDERICKS drove to 4731 Teal Duck Court, Virginia Beach, Virginia and carried a brown shipping box into the residence of defendant WYATT.

39. On February 27, 2002, at Norfolk, Virginia, defendants BENJAMIN, LANE, RIDDICK, SANDERLIN, and WALLER sent Western Union wire transfers, in the amounts

of \$6,000 each, to California.

40. On February 27, 2002, defendant FREDERICKS placed a telephone call to defendant PURNELL.

41. On February 27, 2002, defendant PURNELL received two empty boxes that contained marijuana residue.

42. On February 27, 2002, defendants FREDERICKS and BENJAMIN spoke on the telephone. Defendant FREDERICKS instructed defendant BENJAMIN to send money.

43. On February 27, 2002, defendant FREDERICKS and defendant DOWNIE spoke on the telephone. Defendant FREDERICKS read Western Union wire tracking numbers to defendant DOWNIE over the phone.

44. On February 27, 2002, during a telephone conversation, defendants DOWNIE and FREDERICKS discussed future and past shipments using coded language and referring to marijuana as "food."

45. On February 27, 2002, defendants FREDERICKS and LANE spoke on the telephone. Defendant FREDERICKS instructed defendant LANE to meet him at the Checks Cashed store at 6115 Sewells Point Road in Norfolk, Virginia.

46. On February 27, 2002, defendants FREDERICKS and LANE met at the Check Cashed store on Sewells Point Road in Norfolk, Virginia.

47. On February 27, 2002, defendant LANE carried a full plastic bag into the Checks Cashed store and later exited the store with a piece of paper and an empty plastic bag.

48. On February 28, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone.

49. On February 28, 2002, defendant DOWNIE, after talking with defendant CHARLES, spoke on the telephone with defendant FREDERICKS and asked for the Western Union wire tracking number for the "six" sent by defendant LANE.

50. On February 28, 2002, defendants FREDERICKS, BENJAMIN, and SANDERLIN drove to the Checks Cashed store on 5649 East Princess Anne Road in Norfolk, Virginia. There, defendant DENNIS exited the car carrying a white envelope.

51. On February 28, 2002, Defendants FREDERICKS and DOWNIE spoke on the telephone a number of times. Defendant FREDERICKS read off wire tracking numbers "4169038215" and "8924771847."

52. On February 28, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone. Defendant FREDERICKS provided the addresses of flag houses at 407 Ashlawn Drive, Apartment 5 and 1352 Longdale Drive, Apartment 202, Norfolk, Virginia.

53. On March 1, 2002, two packages addressed to 407 Ashlawn Drive, Apartment 5, Norfolk, Virginia and 1352 Longdale Drive, Norfolk, Virginia arrived at the UPS facility in Norfolk, Virginia. The package addressed to 407 Ashlawn Drive, Apartment 5, Norfolk, Virginia contained approximately 34 pounds of marijuana.

54. On March 1, 2002, defendants DOWNIE and FREDERICKS talked several times on the telephone about the packages sent to Longdale and Ashlawn Drive, Norfolk, Virginia.

55. On March 1, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone. Defendant FREDERICKS expressed concern about possible law enforcement surveillance. Defendant DOWNIE advised defendant FREDERICKS how to avoid detection.

56. On March 1, 2002, defendants FREDERICKS and CHARLES spoke on the telephone and discussed the ramifications of the loss of one of the two boxes of marijuana.

57. On March 1, 2002, defendants FREDERICKS and LANE spoke on the telephone. Defendant FREDERICKS told defendant LANE that they knew all the delivery procedures of UPS and that she should not accept any delivery from a van -- only the truck -- even if the delivery person from the van was dressed in the right shirt. Defendant FREDERICKS reminded defendant LANE of the trouble he encountered before.

58. On March 1, 2002, defendants FREDERICKS and CHARLES spoke on the telephone. Defendant FREDERICKS stated that he was feeling fifty-fifty about it (the chances of a successful delivery) and that should defendant CHARLES see the brown thing (UPS truck), go and get it; if he did not see the brown thing, leave it.

59. On March 1, 2002, defendants DOWNIE and FREDERICKS spoke on the telephone. Defendant DOWNIE told defendant FREDERICKS that he was getting sick of the house thing (delivering marijuana to flag houses).

60. On March 1, 2002, defendants DOWNIE and FREDERICKS spoke on the telephone. Defendant DOWNIE stated that there is thirty-three (pounds of marijuana) in each of them and that if one reaches and the next one does not, they could just sell that one fast, and buy it back so that no one loses anything.

61. On March 1, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone. Defendant DOWNIE confirmed the UPS tracking number for the box sent to Longdale.

62. On March 1, 2002, defendants FREDERICKS and OSBOURNE spoke on the telephone. They discussed a conversation defendant OSBOURNE had with defendant

DOWNIE regarding the boxes sent to Ashlawn and Longdale.

63. On March 2, 2002, defendant FREDERICKS placed a telephone call to his father and asked his father to title property in his father's name.

64. On March 2, 2002, defendants CHARLES and FREDERICKS spoke on the telephone and discussed a future shipment from defendant DOWNIE.

65. On March 2, 2002, defendants OSBOURNE and FREDERICKS spoke on the telephone. Defendant OSBOURNE told defendant FREDERICKS that he has arrived at the Ramada Inn, Military Highway, Norfolk, Virginia with approximately 44 pounds of "food", which is the code for marijuana.

66. On March 3, 2002, defendants FREDERICKS and LANE spoke on the telephone. Defendant FREDERICKS told defendant LANE that he was going to assess the situation at Longdale.

67. On March 4, 2002, defendant FREDERICKS arranged to leave a box of marijuana at defendant DENNIS' house.

68. On March 4, 2002, defendants FREDERICKS and LANE spoke on the telephone. Defendant LANE informed defendant FREDERICKS that an unindicted co-conspirator needed some marijuana.

69. On March 4, 2002, defendants FREDERICKS and CHARLES spoke on the telephone. Defendants CHARLES and FREDERICKS discussed the available supply of marijuana and getting defendant WYATT to move some of it.

70. On March 4, 2002, defendants FREDERICKS and SANDERLIN spoke on the telephone about meeting at the Ramada Inn, North Military Highway, Norfolk, Virginia.

71. On March 4, 2002, defendants FREDERICKS and DOWNIE spoke on the

telephone about the Ashlawn box of marijuana being “lost”, boxes shipped to New York by defendant DOWNIE, defendant HURT’s role in the conspiracy, and Western Union wires.

72. On March 4, 2002, defendants FREDERICKS and TYSON spoke on the telephone. Defendant TYSON used coded words to ask defendant FREDERICKS for 15 pounds of marijuana which was priced at \$725 per pound.

73. On March 4, 2002, defendants FREDERICKS and OSBOURNE spoke on the telephone about packaging money.

74. On March 5, 2002, defendants FREDERICKS and CHARLES spoke on the telephone about changing marijuana shipping methods back to larger scale amounts routed through defendant HURT, an employee of Piedmont Aviation.

75. On March 5, 2002, defendants FREDERICKS and OSBOURNE spoke on the telephone about the Ashlawn box of marijuana.

76. On March 6, 2002, defendants FREDERICKS and CHARLES spoke on the telephone. Defendant CHARLES told defendant FREDERICKS that defendants BOONE and WYATT were ready to move some marijuana, discussed getting defendant HURT to ship boxes at Piedmont Aviation, and discussed the “flag” houses.

77. On March 6, 2002, defendants FREDERICKS and TYSON met at Piedmont Aviation, in Norfolk, Virginia. Defendant TYSON transferred several items into the trunk of the car defendant FREDERICKS was driving.

78. On March 6, 2002, defendants FREDERICKS and TYSON spoke on the telephone about defendant TYSON receiving marijuana.

79. On March 7, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone about marijuana inventory and sending Western Union wire payments.



80. On March 7, 2002, defendants FREDERICKS and LANE spoke on the telephone about the arrest of a drug dealer and transferring titles into LANE's name.

81. On March 7, 2002, defendant FREDERICKS wired money at the Money Mart, 5649 Princess Anne Road, Norfolk, Virginia.

82. On March 9, 2002, defendants FREDERICKS and an unindicted co-conspirator spoke on the telephone. The unindicted co-conspirator told defendant FREDERICKS that he needed the scale from defendant BENJAMIN's hotel room because he has drugs he needed to split.

83. On March 11, 2002, defendants FREDERICKS and CHARLES spoke on the telephone. Defendant CHARLES told defendant FREDERICKS that defendant DOWNIE wanted defendant FREDERICKS to call defendant HURT.

84. On March 11, 2002, defendants FREDERICKS and PURNELL spoke on the telephone about returning the rental car and meeting together.

85. On March 11, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone about "food" being sent from California and wires being sent from Virginia.

86. On March 12, 2002, defendants DOWNIE, FREDERICKS and HURT spoke on the telephone about sending packages, as they had before, through HURT at Piedmont Aviation.

87. On March 12, 2002, defendants FREDERICKS and MINER spoke on the telephone and discussed a pending shipment of marijuana.

88. On March 12, 2002, defendants FREDERICKS and MINER spoke on the telephone about motivating co-conspirators, including defendant MINER, to do more and marijuana shipments to defendant ALLEYNE's father's and uncle's business in

Portsmouth, Virginia.

89. On March 12, 2002, defendants FREDERICKS and DOWNIE spoke on the telephone and arranged for a package to be sent to a “flag” address in Chesapeake, Virginia.

90. On March 12, 2002, defendants FREDERICKS and CHARLES spoke on the telephone about having defendant DOWNIE ship marijuana to defendant ALLEYNE, existing marijuana inventory, boxes being shipped to other operating hubs, subordinates receiving marijuana (including defendant WYATT), and defendant OSBOURNE transporting marijuana from New York to Virginia.

91. On March 12, 2002, defendants DOWNIE and FREDERICKS spoke on the telephone about the need for FREDERICKS’ people to be organized and the stress that defendant CHARLES was feeling.

92. On March 12, 2002, defendants DOWNIE and ALLEYNE spoke on the telephone about places to send marijuana.

93. On March 13, 2002, defendant FREDERICKS waited for a box containing approximately 28 pounds of marijuana to be sent to 1324 MacDonald Road, Apartment B, Chesapeake, Virginia. Then, defendant FREDERICKS, DOWNIE, and CHARLES spoke on the telephone about the box.

94. On March 13, 2002, defendants ALLEYNE, DOWNIE and FREDERICKS spoke on the telephone about shipping marijuana to defendant ALLEYNE in Portsmouth, Virginia using the “brown men” (UPS).

95. On March 13, 2002, defendants BOONE, CHARLES, and FREDERICKS spoke on the telephone about the marijuana business.

96. On March 13, 2002, at defendant FREDERICKS' instruction, defendant HURT performed an online inquiry about the package that never made it to Chesapeake, Virginia. Defendants FREDERICKS and CHARLES spoke on the telephone and expressed concern about their missing marijuana shipments.

97. On March 13, 2002, defendants FREDERICKS and ALLEYNE spoke on the telephone about the marijuana business. Defendants FREDERICKS and DOWNIE also spoke on the telephone and expressed frustration about the missing marijuana shipments. Defendant DOWNIE advised defendant FREDERICKS about flexibility and being cautious.

98. On March 13, 2002, defendants OSBOURNE and FREDERICKS spoke on the telephone about using females to "mule" the marijuana in from New York as an alternative to overnight shipments to Virginia.

99. On March 14, 2002, a box was shipped by the California co-conspirators from Package to Go, Cerritos, California to Royal Automotive and Paint, 912 High Street, Portsmouth, Virginia, where it was accepted by a person called "Pops" and delivered to defendant FREDERICKS.

100. On March 14, 2002, as defendant OSBOURNE was driving to Florida, defendants OSBOURNE and FREDERICKS spoke on the telephone about defendant DOWNIE and the deceitful nature of the marijuana business.

101. On March 14, 2002, defendants DOWNIE and FREDERICKS spoke on the telephone about sending money and marijuana.

102. On March 14, 2002, defendants FREDERICKS and CHARLES spoke on the telephone about net profits realized after deducting for expenses.

103. On March 15, 2002, defendants OSBOURNE and FREDERICKS spoke on

the telephone. Defendant OSBOURNE stated that he had “three zero” (pounds of marijuana available).

104. On March 15, 2002, defendants SANDERLIN and FREDERICKS spoke on the telephone about the Western Union wire that defendant SANDERLIN sent.

105. On March 16, 2002, defendants ALLEYNE and FREDERICKS spoke on the telephone about preparing ALLEYNE’s people, including defendant ARTHUR, to receive another box of marijuana.

106. On March 17, 2002, defendant OSBOURNE arrived in Virginia on his way to Florida. On the telephone, defendant OSBOURNE told defendant FREDERICKS, using coded language, that he had “three two” (pounds of marijuana) available. Defendant FREDERICKS related this information to defendant CHARLES over the telephone.

107. On March 18, 2002, defendants CHARLES and FREDERICKS spoke on the telephone about providing all or part of the thirty-two pounds of marijuana to defendants WYATT and BOONE, and an unindicted co-conspirator.

108. On March 18, 2002, defendants DOWNIE, FREDERICKS and LANE spoke on the telephone about Western Unions wires sent by defendant LANE.

109. On March 19, 2002, a box containing approximately 36 pounds of marijuana was sent via UPS from California to defendants ALLEYNE’s and ARTHUR’s “flag” address at Royal Automotive and Paint, 912 High Street, Portsmouth, Virginia.

110. On March 19, 2002, defendant FREDERICKS took the box with the 36 pounds of marijuana to 6590 Stoney Point North, Norfolk, Virginia, the residence of defendant DENNIS.

111. On March 19, 2002, defendant FREDERICKS made a delivery to defendant

WYATT at Teal Duck Court, Virginia Beach, Virginia.

112. On March 19, 2002, defendants FREDERICKS and CHARLES spoke on the telephone about amounts of marijuana sold to defendants BOONE, PURNELL, WYATT, and co-conspirators from the Eastern Shore, and \$64,000 that needed to be sent to defendant DOWNIE via Western Union.

113. On March 19, 2002, defendants ALLEYNE, FREDERICKS, and DOWNIE spoke on the telephone about amounts of money that co-conspirators working under defendant PURNELL sent via Western Union and the comparative reliability of defendants ALLEYNE, ARTHUR and "Pops".

114. On March 21, 2002, defendants FREDERICKS and OSBOURNE spoke on the telephone about defendant CHARLES' calculation of money and defendant OSBOURNE's purchase of a Ford Expedition. Defendants FREDERICKS and CHARLES spoke on the telephone about the money owed to defendant OSBOURNE. Defendants FREDERICKS and DOWNIE spoke on the telephone about shipping more marijuana to defendants ALLEYNE's and ARTHUR's place in Portsmouth, Virginia.

115. On March 22, 2002, at Royal Automotive and Paint, 912 High Street, Portsmouth, Virginia, defendants ALLEYNE and ARTHUR received two boxes shipped from defendant DOWNIE and transferred them to defendant FREDERICKS.

116. On March 22, 2002, defendant FREDERICKS drove the two boxes to the residence of defendant DENNIS at 6590 Stoney Point, Norfolk, Virginia.

117. On March 22, 2002, defendant FREDERICKS delivered two styrofoam containers to defendant WYATT at 4731 Teal Duck Court, Virginia Beach, Virginia.

118. On March 23, 2002, defendants FREDERICKS, ALLEYNE, MINER,

PURNELL, and RIDDICK spoke on the telephone about marijuana and Western Union wires.

119. On March 25, 2002, defendants FREDERICKS and ARTHUR spoke on the telephone. Defendant ARTHUR expressed dismay about the small sum of money he received for having “Pops” sign and accept the boxes of marijuana at Royal Automotive and Paint, 912 High Street, Portsmouth, Virginia. Defendant FREDERICKS assured defendant ARTHUR that reasonable compensation would be forthcoming directly from defendant FREDERICKS.

120. On March 25, 2002, an unindicted co-conspirator agreed to meet defendant FREDERICKS at Check’s Cashed, in Norfolk, Virginia.

121. On March 25, 2002, defendants DOWNIE and FREDERICKS spoke on the telephone, using partially coded language. They discussed Western Union wire tracking numbers for wires sent by defendant RIDDICK, that \$26,000 can buy about 86 pounds of marijuana, defendant CHARLES, and defendant ALLEYNE’s meager payment to the co-conspirators at Royal Automotive and Paint.

122. On March 25, 2002, defendants FREDERICKS and HURT spoke on the telephone and arranged to meet.

123. On March 25, 2002, defendants CHARLES and FREDERICKS spoke on the telephone. Using coded language, defendant FREDERICKS stated that they are receiving “thirty-nine” pounds of marijuana.

124. On March 25, 2002, defendants CHARLES and FREDERICKS spoke on the telephone. Defendant CHARLES informed defendant FREDERICKS that defendant PURNELL lost 3 pounds of marijuana.

125. On March 26, 2002, two boxes shipped from Package to Go, Cerritos, California to Royal Automotive and Paint, 912 High Street, Portsmouth, Virginia, and containing approximately 92 pounds of marijuana, arrived at the UPS facility, Norfolk, Virginia.

126. On March 26, 2002, defendants ALLEYNE, CHARLES, DOWNIE, and FREDERICKS spoke on the telephone about missing boxes of marijuana, defendant DOWNIE's tracking of the boxes using the UPS online tracking system, the potential for interdiction and undercover delivery by law enforcement posing as "brown boys", alternative means of shipping marijuana using the Mexican suppliers, and the price for Virginia delivery.

127. On March 26, 2002, using coded language, defendants BOONE and FREDERICKS spoke on the telephone about making money by selling marijuana in more profitable increments.

128. On March 27, 2002, defendant LANE wired money to California and agreed to accept a package of marijuana for defendant FREDERICKS.

129. On March 27, 2002, defendants RIDDICK and FREDERICKS spoke on the telephone about selling marijuana in more profitable increments.

130. On April 1, 2002, an unindicted co-conspirator and defendant FREDERICKS spoke on the telephone. The unindicted co-conspirator told defendant FREDERICKS that he needed to get something from defendant BENJAMIN's house.

131. On April 2, 2002, an unindicted co-conspirator and defendant FREDERICKS spoke on the telephone about marijuana.

132. On April 7, 2002, defendants FREDERICKS, DOWNIE, MINER, and

RIDDICK spoke on the telephone. Defendant FREDERICKS arranged for defendants MINER and RIDDICK to travel to New Jersey to receive marijuana from defendants DELGADO and GRANT. Defendant DOWNIE, who supplied marijuana to defendants DELGADO and GRANT, assured defendants MINER and RIDDICK that the trip was safe.

133. On or about April 9, 2002, defendants MINER and RIDDICK drove back to Virginia from New Jersey. During the drive, defendants MINER, RIDDICK, and FREDERICKS spoke on the telephone. Defendant FREDERICKS expressed his concerns about the marijuana reaching Virginia and the necessity of wiring money via Western Union.

134. On April 9, 2002, defendants FREDERICK and SANDERLIN spoke on the telephone. Defendant SANDERLIN stated that she wired money to California.

135. On April 11, 2002, defendants DOWNIE and FREDERICKS spoke on the telephone. Defendant DOWNIE explained that boxes of marijuana were robbed from defendants SERVICE and BUCKNOR at gunpoint while they were traveling to a commercial mail location. He explained that defendant SERVICE initially thought the robbers were the police, but they later realized that it was merely opportunistic drug dealers.

136. On April 16, 2002, defendants ALLEYNE and FREDERICKS spoke on the telephone about a fight he was involved in. Defendant FREDERICKS discussed getting one of his guns from defendant PURNELL.

137. On April 16, 2002, defendants MINER and FREDERICKS had a meeting at the Caribbean Kitchen in Virginia Beach, Virginia.

138. On April 17, 2002, defendants CHARLES and FREDERICKS spoke on the



telephone about marijuana inventory, gross receipts, defendant PURNELL's task of "lining up the girls" in stand-by status for the trip, and daycare problems of the female conspirators.

139. On April 18, 2002, an unindicted co-conspirator and defendant FREDERICKS spoke on the telephone. The unindicted co-conspirator told defendant FREDERICKS about his involvement with cocaine and agreed to provide some of it to defendant FREDERICKS.

140. On April 18, 2002, defendants PURNELL and FREDERICKS spoke on the telephone. Defendant PURNELL advised defendant FREDERICKS that two co-conspirator customers wanted one pound of marijuana each.

141. On April 18, 2002, defendants MINER and RIDDICK traveled from New Jersey to Virginia to transport marijuana supplied by defendant DOWNIE. Defendants FREDERICKS and MINER and defendants DELGADO and GRANT spoke on the telephone about defendant MINER's trip.

142. On April 18, 2002, defendants FREDERICKS and MINER spoke on the telephone. Defendant FREDERICKS warned defendant MINER to drive the speed limit.

143. On April 19, 2002, defendants FREDERICKS, MINER and CHARLES spoke on the telephone about meeting at defendant RIDDICK's residence at 2811 Balentine Boulevard, Norfolk, Virginia.

144. On April 19, 2002, defendants FREDERICKS and MINER met and then drove to Eckerd's Drug Store, Tidewater Drive, Norfolk, Virginia, where defendant FREDERICKS received a box from defendant MINER.

145. On April 19, 2002, defendant FREDERICKS carried a box into 2005 Pershing

Avenue, Norfolk, Virginia. Then, defendant FREDERICKS purchased plastic bags. Later, defendant FREDERICKS exited the address carrying full plastic bags and drove to defendant WYATT's residence at 4731 Teal Duck Court, Virginia Beach, Virginia.

146. On April 19, 2002, defendant SANDERLIN arrived at 2005 Pershing Avenue, Norfolk, Virginia empty-handed and left carrying a large, full plastic bag from the house.

147. On April 19, 2002, defendant BENJAMIN arrived at 2005 Pershing Avenue, Norfolk, Virginia and left carrying a large, full plastic bag from the house.

148. On April 19, 2002, defendants FREDERICKS and CHARLES spoke on the telephone about deliveries to defendants BOONE, WYATT and an unindicted co-conspirator. They discussed problems with the quality of the marijuana due to mold.

149. On April 19, 2002, defendant FREDERICKS and an unindicted co-conspirator spoke on the telephone.

150. On May 14, 2002, defendant FREDERICKS placed a full plastic bag in the trunk of his vehicle. He drove and met defendant MINER.

151. On May 14, 2002, defendant BENJAMIN sent Western Union wires from Checks Cashed, Sewells Point Road, Norfolk, Virginia.

152. On May 17, 2002, defendant FREDERICKS carried a box from 2005 Pershing Avenue, Norfolk, Virginia, placed it in his Lexus, drove to 849 Bancker Road, Norfolk, Virginia, and drove a van to a Costco store, and met with an unindicted co-conspirator.

153. On May 29, 2002, defendant BENJAMIN sent wires at the Checks Cashed, 5038 E. Princess Anne Road, Norfolk, Virginia.

154. On May 31, 2002, defendant OSBOURNE was traveling to a hotel room that

was rented for him by defendant FREDERICKS. On the way, in Virginia Beach, Virginia, defendant OSBOURNE possessed with the intent to distribute approximately 100 pounds of marijuana.

(All in violation of 21 United States Code, Section 846.)

## **COUNT TWO**

THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 1999, the exact date to the grand jury being unknown, and continuing thereafter up to and including the date of this indictment in July 2002, in the Eastern District of Virginia and elsewhere, the following 4 defendants:

KAREN ELIZABETH BUCKNOR, a/k/a "Buckers" ,  
SIMEON GARGGON CHARLES, a/k/a "Lion",  
ANDREW PAUL DOWNIE a/k/a "UPS" and "Phillip Gayle",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",

did unlawfully, knowingly, and intentionally engage in a continuing criminal enterprise in that the defendants, did unlawfully, knowingly, and intentionally violate Title 21, United States Code, Sections 841, 843, 846, and 856, such violations including, but not limited to those violations alleged in the instant indictment, specifically Count One and Counts Three through Two Hundred Sixteen, which Counts are re-alleged and incorporated by reference herein as though fully set forth in this Count, and did commit other violations of said statutes which violations all were part of the continuing series of violations of the Controlled Substances Act, Title 21, United States Code, Section 801, et. seq., undertaken by defendants, in concert with at least five other persons with respect to whom the defendants occupied the position of organizer, a supervisor and any other management position, and from which the continuing series of violations the defendants obtained substantial income and resources.

(All in violation of Title 21, United States Code, Sections 848(a) and (c) and Title 18, United States Code, Section 2).

### COUNT THREE

\_\_\_\_\_THE GRAND JURY FURTHER CHARGES THAT:

From in or about June 1999 until in or about July 2002, the exact dates to the grand jury being unknown, in the Eastern District of Virginia and elsewhere, the following 16 defendants:

MARLON BENJAMIN a/k/a "Rapid",  
KAREN ELIZABETH BUCKNOR, a/k/a "Buckers",  
SIMEON GARGGON CHARLES, a/k/a "Lion",  
STEPHANIE ANTOINETTE DEERING,  
SEQUOYA MARY DENNIS, a/k/a "Pumpkin",  
ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
MARLO ANNE HENRY,  
ANNETTE PATRICE LANE,  
NICOLE R. MINER,  
AUTHOR OSMOND OSBOURNE, a/k/a "Tall Man Johnny", "Author Osbourne", and  
"Johnny-Nine",  
KENYA PRINCE CHUNCEY PURNELL, a/k/a "Moses",  
BARBARA LAVETTE RIDDICK, a/k/a "Barbie Lavette Riddick", and "Lynette",  
NAKIA KENYATA SANDERLIN,  
SHEILA WALLER, and  
LAWANDA MARIE WHITE,

did, unlawfully, knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons both known and unknown to the grand jury to commit the following offenses against the United States:

1. To knowingly, willfully, and unlawfully conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate commerce, to wit, the sending and receiving of Western Union wire transfers and money orders which involved the proceeds of a specified unlawful activity, that is, the distribution of marijuana, a Schedule I controlled substance, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and doing so with the intent

to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i) and Title 18, United States Code, Section 2; and

2. To knowingly, willfully, and unlawfully conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate commerce, to wit, the sending and receiving of Western Union wire transfers and money orders which involved the proceeds of a specified unlawful activity, that is, the distribution of marijuana, a Schedule I controlled substance, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, and further knowing that the transactions were designed in whole or in part to conceal and disguise the true nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, and doing so with the intent to promote the carrying on of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i) and Title 18, United States Code, Section 2.

#### WAYS, MANNERS, AND MEANS

The ways, manners, and means to accomplish this conspiracy are set forth in Count One are realleged and incorporated as if fully set forth herein.

#### OVERT ACTS

The overt acts committed in the Eastern District of Virginia and elsewhere to accomplish this conspiracy are set forth in Count One and further detailed by the substantive drug trafficking, money laundering and firearm counts among others, and are realleged and incorporated as if fully set forth herein.

(In violation of Title 18, United States Code, Section 1956(h) and Title 18, United States Code, Section 2).

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**COUNTS FOUR THROUGH THIRTY-SEVEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth herein, in the Eastern District of Virginia, the following 24 defendants:

EARL ADOLPHUS ALLEYNE,  
STANFORD LYNDEN ARTHUR,  
MARLON BENJAMIN a/k/a "Rapid",  
KEVIN MARCEL BOONE, a/k/a "Neighbor",  
KAREN ELIZABETH BUCKNOR, a/k/a "Bucker",  
SIMEON GARGGON CHARLES, a/k/a "Lion",  
JANE DOE ONE, a/k/a "Vimalam Delaney", "V", and "Vimalam Lakami Ananda  
Hamilton-Delaney",  
ANTHONY DELGADO,  
SEQUOYA MARY DENNIS, a/k/a "Pumpkin",  
ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
OMAR LEE GRANT,  
STANLEY ALPHONSO HURT,  
TONDA ANN JAMES,  
ANNETTE PATRICE LANE,  
NICOLE R. MINER,  
AUTHORO OSMOND OSBOURNE, a/k/a "Tall Man Johnny", "Author Osbourne", and  
"Johnny-Nine",  
KENYA PRINCE CHUNCEY PURNELL, a/k/a "Moses",  
BARBARA LAVETTE RIDDICK, a/k/a "Barbie Lavette Riddick" and "Lynette",  
NAKIA KENYATA SANDERLIN,  
CASEY RICARDO SERVICE, a/k/a "Dooka" and "Ricky",  
SHAUN ALISTER TYSON,  
LAWANDA MARIE WHITE, and  
and ANTONIO JERMAINE WYATT, a/k/a "Tone",

charged in one or more counts below, did, unlawfully, knowingly and intentionally possess, or attempt to possess, with the intent to distribute a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance. Each violation of the law set forth below constitutes a separate count of this Indictment.

Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
4	06/26/99, 1455 Bayhead Drive, Virginia Beach, VA	4.5 kilograms (10 pounds)	DOWNIE FREDERICKS
5	09/23/99 1712 Melon Street Norfolk, VA	7 kilograms (15 pounds)	DOWNIE WHITE
6	09/23/99 1712 Melon Street, Norfolk, VA	4.5 kilograms (10 pounds)	DOWNIE WHITE
7	09/23/99 1125 Jernigan Avenue, Norfolk, VA	less than 50 kilograms (110 pounds)	DOWNIE FREDERICKS WHITE
8	02/25/00 842C Avenue Apt 5, Norfolk, VA	5.5 kilograms (12.5 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE
9	02/25/00 Virginia Beach, VA	1 kilogram (2 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS
10	02/26/00 2915 Marne Avenue, Norfolk, Va	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE



Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
11	02/26/00 215 Ridgewell Circle, Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE
12	02/26/00 9621 Marlow Avenue Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS JAMES WHITE
13	02/26/00 1344 Godfrey Avenue, Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE
14	02/26/00 2734 Tidewater Drive, Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE
15	02/26/00 1122 City Hall Avenue Norfolk, VA sent via 1666 Hunter Street, Norfolk, VA	6 kilograms of marijuana (14 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS
16	02/26/00 1009 Melton Street, Chesapeake, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE

Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
17	05/04/00 2912 Earls Court Avenue Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS
18	05/04/00 1324 McDonald Road, Apt B Chesapeake, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS MINER
19	05/17/00 3120 Westminster Ave Norfolk, VA	5.5 kilograms (12 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS
20	06/08/00 539 West 36 <sup>th</sup> Street, Apt # 3, Norfolk, VA	9.5 kilograms (21 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS
21	2/20/02 Mayfair Apartment Complex Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DENNIS DOWNIE FREDERICKS PURNELL
22	2/27/02 Norfolk, VA and Virginia Beach, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DENNIS DOWNIE FREDERICKS PURNELL WYATT

Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
23	03/01/02 407 Ashlawn Drive, Apt 5, Norfolk, VA	16 kilograms (35 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS LANE PURNELL
24	03/02/02 Ramada Inn Norfolk, VA	20 kilograms (44 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS OSBOURNE PURNELL
25	03/4/02 1352 Longdale Drive, Apt 201 Norfolk, VA	16 kilograms (35 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS LANE OSBOURNE PURNELL
26	03/06/02 Norfolk Airport Norfolk, VA	7 kilograms (15 pounds)	FREDERICKS TYSON
27	03/13/02 1324 McDonald Road, Apt B Chesapeake, VA	13 kilograms (28 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS HURT LANE MINER
28	03/14/02 Royal Automotive and Paint 912 High Street Portsmouth, VA	16 kilograms (36 pounds)	ALLEYNE ARTHUR BUCKNOR CHARLES DOWNIE FREDERICKS WYATT

Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
29	03/18/02 Ramada Inn Norfolk, VA	14.5 kilograms (32 pounds)	BUCKNOR CHARLES DOWNIE FREDERICKS OSBOURNE WYATT
30	03/19/02 Royal Automotive and Paint 912 High Street Portsmouth, VA	16 kilograms (36 pounds)	ALLEYNE ARTHUR BUCKNOR CHARLES DENNIS DOWNIE FREDERICKS WYATT
31	03/22/02 Royal Automotive and Paint 912 High Street Portsmouth, VA	less than 50 kilograms (110 pounds)	ALLEYNE ARTHUR BUCKNOR CHARLES DENNIS DOWNIE FREDERICKS WYATT
32	03/26/02 Royal Automotive and Paint 912 High Street Portsmouth, VA	42 kilograms (92 pounds)	ALLEYNE ARTHUR BOONE BUCKNOR CHARLES DOWNIE FREDERICKS WYATT

Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
33	04/09/02 Norfolk and Virginia Beach, VA (from California via New Jersey)	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES DELGADO DOWNIE FREDERICKS GRANT MINER RIDDICK
34	04/19/02 Norfolk and Virginia Beach, VA (from California via New Jersey)	less than 50 kilograms (110 pounds)	BENJAMIN BOONE BUCKNOR CHARLES JANE DOE ONE DELGADO DOWNIE FREDERICKS GRANT MINER WYATT SANDERLIN SERVICE
35	05/02/02 Lionheart Promotions Norfolk, VA	less than 50 kilograms (110 pounds)	BENJAMIN BUCKNOR CHARLES JANE DOE ONE DOWNIE FREDERICKS SANDERLIN SERVICE
36	05/17/02 Norfolk, VA	less than 50 kilograms (110 pounds)	BUCKNOR CHARLES JANE DOE ONE DOWNIE FREDERICKS SERVICE

Count	Approximate Date and Location	Approximate Amount of Marijuana Attempted to be Possessed, or Possessed, with the Intent to Distribute	Defendants charged in Count
37	05/31/02 Virginia Beach, VA	about 50 kilograms (110 pounds)	BUCKNOR CHARLES JANE DOE ONE DOWNIE FREDERICKS SERVICE OSBOURNE

(All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(D), Title 21, United States Code, 846, and Title 18, United States Code, Section 2).

**COUNTS THIRTY-EIGHT THROUGH TWO HUNDRED AND SIXTEEN**

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, the following  
19 defendants:

EARL ADOLPHUS ALLEYNE,  
STANFORD LYNDEN ARTHUR,  
MARLON BENJAMIN a/k/a "Rapid",  
KEVIN MARCEL BOONE, a/k/a "Neighbor",  
SIMEON GARGGON CHARLES, a/k/a "Lion",  
ANTHONY DELGADO,  
SEQUOYA MARY DENNIS, a/k/a "Pumpkin",  
ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
OMAR LEE GRANT,  
STANLEY ALPHONZO HURT,  
ANNETTE PATRICE LANE,  
NICOLE R. MINER,  
AUTHORO OSMOND OSBOURNE, a/k/a "Tall Man Johnny", "Author Osbourne", and  
"Johnny-Nine",  
KENYA PRINCE CHUNCEY PURNELL, a/k/a "Moses",  
BARBARA LAVETTE RIDDICK, a/k/a "Barbie Lavette Riddick" and "Lynette",  
NAKIA KENYATA SANDERLIN,  
SHAUN ALISTER TYSON, and  
LAWANDA MARIE WHITE,

charged in one or more counts listed below by their last name, did, knowingly and intentionally use the communication facilities described below, in committing, causing, and facilitating offenses charged in Counts One and Two and Four through Thirty-Seven of this Indictment, which offenses are incorporated by reference and are all violations of the Controlled Substance Act under Title 21 of the United States Code. Each use of the communication facility constitutes a separate violation of law and a separate count of this Indictment as set forth below.

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
38	2/26/02 1432 hrs EST	757-622-7807	757-342-7162	FREDERICKS	1
39	2/27/02 0943 hrs EST	757-342-7162	757-438-3432	FREDERICKS PURNELL	170
40	2/27/02 1007 hrs EST	310-897-4828	757-342-7162	FREDERICKS DOWNIE	177
41	2/27/02 1010 hrs EST	757-342-7162	757-461-2380	FREDERICKS BENJAMIN	178
42	02/27/02 1431 hrs EST	310-897-4828	757-342-7162	FREDERICKS DOWNIE	230
43	02/27/02 1431 hrs EST	757-459-2214	757-342-7162	FREDERICKS SANDERLIN	231
44	02/27/22 1447 hrs EST	757-408-3584	757-342-7162	FREDERICKS SANDERLIN	232
45	02/27/02 1449 hrs EST	757-408-3584	757-342-7162	FREDERICKS SANDERLIN	233 and 234
46	02/27/02 1452 hrs EST	757-408-3584	757-342-7162	FREDERICKS SANDERLIN	235
47	02/27/02 1452 hrs EST	757-408-3584	757-342-7162	FREDERICKS SANDERLIN	239
48	02/27/02 1505 hrs EST	757-342-7162	757-408-3584	FREDERICKS SANDERLIN	240



Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
49	02/27/02 1621 hrs EST	757-459-2214	757-342-7162	FREDERICKS SANDERLIN	256
50	02/27/02 1841 hrs EST	757-543-4989	757-342-7162	FREDERICKS CHARLES	269
51	02/27/02 1927 hrs EST	757-587-7156	757-342-7162	FREDERICKS LANE	293
52	02/27/02 2015 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	303
53	02/27/02 2247 hrs EST	757-342-7162	757-408-3584	FREDERICKS SANDERLIN	329
54	02/28/02 1036 hrs EST	757-342-7162	310-897-4828	FREDERICKS SANDERLIN	343
55	02/28/02 1117 hrs EST	757-342-7162	310-897-4828	FREDERICKS DOWNIE	350
56	02/28/02 1142 hrs EST	757-342-7162	310-897-4828	FREDERICKS DOWNIE	355
57	02/28/02 1529 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	377
58	02/28/02 1652 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	398
59	02/28/02 1656 hrs EST	757-342-7162	800-325-6000	FREDERICKS LANE	403

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
60	02/28/02 1730 hrs EST	323-807-4765	757-342-7162	FREDERICKS DOWNIE	419
61	02/28/02 1801 hrs EST	757-236-1579	757-342-7162	FREDERICKS RIDDICK	429
62	02/28/02 1901 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	446
63	02/28/02 1948 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	464
64	02/28/02 1950 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	465
65	03/01/02 0904 hrs EST	757-613-1541	757-342-7162	FREDERICKS LANE	510
66	03/01/02 0929 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	514
67	03/01/02 0945 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	517
68	03/01/02 0945 hrs EST	757-342-7162	757-438-3432	FREDERICKS PURNELL DOWNIE	518
69	03/01/02 0959 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	523
70	03/01/02 1002 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	524

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
71	03/01/02 1020 hrs EST	757-438-3432	757-342-7162	FREDERICKS PURNELL DOWNIE	530
72	03/01/02 1023 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES DOWNIE	531
73	03/01/02 1043 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	532
74	03/01/02 1110 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	542
75	03/01/02 1207 hrs EST	757-342-7162	757-613-1541	FREDERICKS RIDDICK	558
76	03/01/02 1212 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	562
77	03/01/02 1234 hrs EST	757-342-7162	757-613-1541	FREDERICKS FNU LNU	572
78	03/01/02 1319 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	596
79	03/01/02 1322 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	598/ 599
80	03/01/02 1328 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	601
81	03/01/02 1338 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	606

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
82	03/01/02 1341 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE CHARLES	607
83	03/01/02 1349 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	611
84	03/01/02 1401 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	614
85	03/01/02 1405 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	615
86	03/01/02 1659 hrs EST	757-342-7162	757-729-0289	FREDERICKS LANE	672
87	03/01/02 1727 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	685
88	03/01/02 1730 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	686
89	03/01/02 1809 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	695
90	03/01/02 1818 hrs EST	757-729-0289	757-342-7162	FREDERICKS LANE	700
91	03/01/02 1823 hrs EST	757-729-0289	757-342-7162	FREDERICKS LANE	707
92	03/01/02 1830 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	709

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
93	03/01/02 1834 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	711
94	03/01/02 1913 hrs EST	757-729-0289	757-342-7162	FREDERICKS LANE	721
95	03/01/02 1915 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	722
96	03/01/02 1918 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	723
97	03/01/02 2019 hrs EST	757-342-7162	757-560-8369	FREDERICKS OSBOURNE	746
98	03/01/02 2207 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	763
99	03/02/02 1552 hrs EST	757-342-7162	757-560-8369	FREDERICKS OSBOURNE	847
100	03/02/02 1634 hrs EST	757-560-8369	757-342-7162	FREDERICKS OSBOURNE	852
101	03/02/02 1719 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	864
102	03/02/02 2210 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	980
103	03/04/02 1055 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	1017

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
104	03/04/02 1116 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	1027
105	03/04/02 1145 hrs EST	757-342-7162	757-455-8552	FREDERICKS DENNIS	1036
106	03/04/02 1411 hrs EST	757-613-1541	757-342-7162	FREDERICKS LANE	1057
107	03/04/02 1444 hrs EST	757-342-7162	757-560-8369	FREDERICKS OSBOURNE	1066
108	03/04/02 1455 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	1072
109	03/04/02 1531 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	1082
110	03/04/02 1823 hrs EST	757-344-0084	757-342-7162	FREDERICKS TYSON	1112
111	03/04/02 2011 hrs EST	757-342-7162	757-459-2214	FREDERICKS SANDERLIN	1124
112	03/04/02 2217 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	1149
113	03/05/02 1538 hrs EST	757-342-7162	757-560-8369	FREDERICKS OSBOURNE	1215
114	03/05/02 1642 hrs EST	757-342-7162	757-583-0196	FREDERICKS	1239

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
115	03/05/02 2108 hrs EST	757-342-7162	757-583-0196	FREDERICKS	1287
116	03/05/02 1123 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	1319
117	03/06/02 1158 hrs EST	757-342-7162	757-857-3432	FREDERICKS HURT	1323
118	03/06/02 1345hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	1363
119	03/06/02 1736 hrs EST	757-342-7162	757-344-0084	FREDERICKS TYSON	1403
120	03/06/02 1741 hrs EST	757-342-7162	757-344-0084	FREDERICKS TYSON	1405
121	03/07/02 1445 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	1521
122	03/07/02 2146 hrs EST	757-342-7162	757-313-3673	FREDERICKS LANE	1609
123	3/11/02 1441 hrs EST	757-342-7162	757-344-0084	FREDERICKS TYSON	1869
124	03/11/02 1454 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	1875
125	03/11/02 1724 hrs EST	757-342-7162	757-438-3432	FREDERICKS PURNELL	1900

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
126	03/11/02 2125 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	1940
127	03/11/02 2159 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	1950
128	03/12/02 1056 hrs EST	757-581-4605	757-342-7162	FREDERICKS	1978
129	03/12/02 1134 hrs EST	562-500-0947	757-342-7162	FREDERICKS HURT DOWNIE	1982
130	03/12/02 1724 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	2087
131	03/12/02 1938 hrs EST	757-328-2740	757-342-7162	FREDERICKS DOWNIE	2106
132	03/12/02 1947 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE ALLEYNE	2112
133	03/13/02 1013 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	2166
134	03/13/02 1150 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	2206
135	03/13/02 1153 hrs EST	757-342-7162	757-857-3482	FREDERICKS HURT	2207/ 2208
136	03/13/02 1201 hrs EST	757-639-5339	757-342-7162	FREDERICKS HURT	2212



Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
137	03/13/02 1219 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	2215
138	03/13/02 1245 hrs EST	757-342-7142	757-393-6515	FREDERICKS ALLEYNE	2222
139	03/13/02 1525 hrs EST	718-675-7003	757-342-7162	FREDERICKS OSBOURNE	2241
140	03/13/02 1649 hrs EST	757-393-6515	757-342-7162	FREDERICKS ALLEYNE	2252
141	03/13/02 1712 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	2260
142	03/13/02 1717 hrs EST	757-342-7162	757-393-6515	FREDERICKS ALLEYNE	2262
143	03/13/02 2037 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	2338
144	3/13/02 2121 hrs EST	757-342-7162	757-328-3848	FREDERICKS BOONE	2358
145	3/13/02 2123 hrs EST	757-342-7162	757-328-3848	FREDERICKS BOONE	2359
146	3/13/02 2128 hrs EST	757-342-7162	757-328-3848	FREDERICKS BOONE	2361
147	03/13/02 2309 hrs EST	757-342-7162	757-393-6515	FREDERICKS ALLEYNE	2366

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
148	03/14/02 0930 hrs EST	757-399-9837	757-342-7162	FREDERICKS CHARLES	2379
149	03/14/02 1045 hrs EST	718-675-7003	757-342-7162	FREDERICKS OSBOURNE	2395
150	03/14/02 1121 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	2411
151	03/14/02 1219 hrs EST	757-342-7162	757-393-6515	FREDERICKS ALLEYNE	2432
152	03/14/02 2207 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	2553
153	03/15/02 1224 hrs EST	757-342-7162	757-459-2214	FREDERICKS SANDERLIN	2601
154	3/15/02 1237 hrs EST	757-342-7162	718-675-7003	FREDERICKS OSBOURNE	2603
155	03/15/02 1528 hrs EST	757-342-7162	757-408-3584	FREDERICKS SANDERLIN	2645
156	03/17/02 1546 hrs EST	917-531-6585	757-342-7162	FREDERICKS OSBOURNE	2912
157	3/17/02 1612 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	2915
158	3/18/02 1125 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	2979

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
159	3/18/02 1407 hrs EST	757-342-7162	562-500-0947	FREDERICKS LANE DOWNIE	3030
160	03/19/02 0910 hrs EST	757-582-9504	757-342-7162	FREDERICKS ALLEYNE	3176
161	3/19/02 1121 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	3188
162	3/19/02 1137 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	3191
163	3/19/02 1336 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	3223
164	3/19/02 1348 hrs EST	757-342-7162	560-500-0947	FREDERICKS DOWNIE	3227
165	3/19/02 1349 hrs EST	757-438-3432	757-342-7162	FREDERICKS PURNELL	3229
166	03/19/02 1520 hrs EST	757-342-7162	757-328-2740	FREDERICKS CHARLES	3253
167	03/19/02 1812 hrs EST	757-342-7162	757-393-6515	FREDERICKS ALLEYNE	3291
168	3/19/02 2117 hrs EST	562-500-0947	757-342-7162	FREDERICKS DOWNIE	3334
169	3/20/02 1721 hrs EST	757-342-7162	757-583-0196	FREDERICKS	3453

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
170	3/21/02 1423 hrs EST	917-531-6585	757-342-7162	FREDERICKS OSBOURNE	3563
171	3/21/02 1423 hrs EST	757-342-7162	757-560-8369	FREDERICKS OSBOURNE	3563
172	3/21/02 1851 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	3607
173	3/23/02 1616 hrs EST	757-342-7162	757-438-3432	FREDERICKS PURNELL	3978
174	3/23/02 1655 hrs EST	757-342-7162	757-857-9480	FREDERICKS RIDDICK	3993
175	3/23/02 1725 hrs EST	757-342-7162	757-438-3432	FREDERICKS PURNELL	3998
176	3/23/02 1758 hrs EST	757-342-7162	757-535-3330	FREDERICKS ALLEYNE	4018
177	3/23/02 1800 hrs EST	757-714-2360	757-342-7162	FREDERICKS RIDDICK	4019
178	3/23/02 1814 hrs EST	757-729-0289	757-342-0289	FREDERICKS MINER	4028
179	3/23/02 1843 hrs EST	757-626-1540	757-342-7162	FREDERICKS RIDDICK	4032
180	3/23/02 1846 hrs EST	757-342-7162	757-613-1541	FREDERICKS LANE	4035

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
181	3/23/02 2136 hrs EST	757-438-3432	757-342-7162	FREDERICKS PURNELL	4070
182	3/25/02 1049 hrs EST	757-342-7162	757-582-9504	FREDERICKS ARTHUR	4203
183	3/25/02 1106 hrs EST	757-342-7162	757-857-9480	FREDERICKS	4205
184	3/25/02 1127 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	4206
185	3/25/02 1706 hrs EST	757-342-7162	757-582-9504	FREDERICKS ARTHUR	4266
186	3/25/02 1931 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	4305
187	3/25/02 2143 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	4312
188	3/26/02 1125hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	4352
189	3/26/02 1738 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	4447
190	3/27/02 1837 hrs EST	757-328-3848	757-342-7162	FREDERICKS BOONE	4582
191	3/27/02 1844 hrs EST	757-857-9450	757-342-7162	FREDERICKS RIDDICK	4583

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
192	04/07/02 1229 hrs EST	757-342-7162	973-931-2770	FREDERICKS GRANT	6220
193	04/07/02 1406 hrs EST	757-342-7162	530-209-1466	FREDERICKS DOWNIE	6254
194	04/07/02 1408 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	6255
195	04/07/02 1414 hrs EST	757-342-7162	530-209-1466	FREDERICKS DOWNIE	6257
196	04/07/02 1414 hrs EST	757-342-7162	530-209-1466	FREDERICKS DOWNIE	6260
197	04/09/02 1604 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	6304
198	04/09/02 1746 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER RIDDICK	6330
199	04/09/02 2013 hrs EST	757-408-3584	757-342-7162	FREDERICKS SANDERLIN	6369
200	04/11/02 2123 hrs EST	757-342-7162	562-500-0947	FREDERICKS DOWNIE	6710
201	04/14/02 1444 hrs EST	757-342-7162	757-438-1346	FREDERICKS	7056
202	04/16/02 1528 hrs EST	757-342-7162	757-582-3096	FREDERICKS ALLEYNE	7373

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
203	04/16/02 1135 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	7432
204	04/16/02 2002 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	7496
205	04/16/02 2057 hrs EST	757-342-7162	757-393-6515	FREDERICKS ALLEYNE	7531
206	04/17/02 1702 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	7672
207	04/18/02 1631 hrs EST	757-438-3432	757-342-7162	FREDERICKS PURNELL	7792
208	04/18/02 1950 hrs EST	757-342-7162	973-931-2770	FREDERICKS GRANT	7842
209	04/18/02 2134 hrs EST	757-342-7162	973-489-9807	FREDERICKS DELGADO	7895
210	04/18/02 2135 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	7896
211	04/18/02 2237 hrs EST	757-342-7162	757-729-0289	FREDERICKS MINER	7925
212	04/19/02 0832 hrs EST	757-729-0289	757-342-7162	FREDERICKS MINER	7954
213	04/19/02 1209 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	8001

Count	Date and Time of Use	Facility Used	Facility Called	Defendants charged with using Facilities	Call Number
214	04/19/02 1433 hrs EST	757-328-2740	757-342-7162	FREDERICKS CHARLES	8037
215	04/19/02 1737 hrs EST	757-248-1792	757-342-7162	FREDERICKS WHITE	8086
216	04/25/02 1824 hrs EST	757-342-7162	973-931-2770	FREDERICKS GRANT MINER	8987

(In violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2).



**COUNTS TWO HUNDRED AND SEVENTEEN**  
**THROUGH TWO HUNDRED AND TWENTY-TWO**

\_\_\_\_\_THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth herein, in the Eastern District of Virginia and elsewhere, the following 9 defendants below:

EARL ADOLPHUSALLEYNE,  
KAREN ELIZABETH BUCKNOR, a/k/a "Buckers",  
SIMEON GARGGON CHARLES, a/k/a "Lion",  
ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
TONDA ANN JAMES,  
KENYA PRINCE CHUNCEY PURNELL, a/k/a "Moses",  
CASEY RICARDO SERVICE, a/k/a "Dooka" and "Ricky", and  
LAWANDA MARIE WHITE,

did knowingly and unlawfully possess one or more firearms in furtherance of, and use and carry one or more firearms during and in relation to drug trafficking crimes for which he or she may be prosecuted in a court of the United States, including but not limited to, a violation of Title 21, United States Code, Section 846, as alleged in Count One, a violation of Title 21, United States Code, Section 848, as alleged in Count Two, and violations of Title 21, United States Code, Section 841, as alleged in Counts Four through Thirty-Seven, and violations of 21, United States Code, 843(b) as alleged in Counts Thirty-Eight through Two Hundred and Sixteen of this Indictment. Each separate possession of a different firearm, or each use or carrying of a different firearm constitutes a separate violation of law and a separate count of this Indictment.

Count	Date and Location	Firearm(s)	Defendants Charged
217	02/25/00 Virginia Beach, VA	One Firearm	BUCKNOR CHARLES DOWNIE FREDERICKS
218	02/26/00 1666 Hunter St Norfolk, VA	One Firearm	BUCKNOR CHARLES DOWNIE FREDERICKS
219	02/26/00 1112 City Hall Ave Norfolk, VA	Three Firearms	BUCKNOR CHARLES DOWNIE FREDERICKS WHITE
220	02/28/00 9261 Marlow Ave Norfolk, VA	One Firearm	BUCKNOR CHARLES DOWNIE FREDERICKS JAMES
221	04/11/02 Eastern District of Virginia and Los Angeles County, CA	More than one Firearm	BUCKNOR CHARLES DOWNIE FREDERICKS SERVICE
222	04/16/02 Eastern District of VA	More than one Firearm	ALLEYNE BUCKNOR CHARLES DOWNIE FREDERICKS PURNELL

(All in violation of Title 18, United States Code, Sections 924(c)(1) and 2).

**COUNTS TWO HUNDRED AND TWENTY-THREE  
THROUGH FOUR HUNDRED AND TWO**

\_\_\_\_\_THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth herein, in the Eastern District of Virginia, the following 13 defendants below:

MARLON BENJAMIN a/k/a "Rapid",  
STEPHANIE ANTOINETTE DEERING,  
SEQUOYA MARY DENNIS, a/k/a "Pumpkin",  
ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
MARLO ANNE HENRY,  
ANNETTE PATRICE LANE,  
NICOLE R. MINER,  
AUTHORO OSMOND OSBOURNE, a/k/a "Tall Man Johnny", "Author Osbourne", and  
"Johnny-Nine",  
BARBARA LAVETTE RIDDICK, a/k/a "Barbie Lavette Riddick" and "Lynette",  
NAKIA KENYATA SANDERLIN,  
SHEILA WALLER, and  
LAWANDA MARIE WHITE,

charged in one or more counts set forth below, did, knowingly and willfully conduct and attempt to conduct a financial transaction affecting interstate and foreign commerce, to wit: sending and receiving of Western Union wire transfers and money orders, which involved the proceeds of a specified unlawful activity, that is, conspiracy to distribute and possess with intent to distribute marijuana, and distribution and possession with intent to distribute marijuana, with the intent to promote the carrying on of specified unlawful activity, to wit: conspiracy to distribute and possess with intent to distribute marijuana, and distribution and possession with intent to distribute marijuana, and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction, that is the funds in the amounts set forth below, represented the proceeds of

some form of unlawful activity. Each separate wire or money order sent constitutes a separate violation of law and a separate count of this Indictment

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
223	1/2/00	Norfolk, VA	n/a	DOWNIE FREDERICKS WHITE	\$13,500
224	1/8/00	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE MINER	\$6,000
225	2/10/00 21:26 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$5,000
226	2/10/00 21:53 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$5,000
227	2/11/00	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE	\$6,700
228	2/12/00	Chesapeake, VA	Downey, CA	FREDERICKS DOWNIE	\$6,700
229	2/16/00 11:06 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$5,000
230	2/16/00 11:14 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$1,250
231	2/19/00	Chesa- peake, VA	Downey, CA	FREDERICKS DOWNIE	\$2,400
232	2/21/00	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$2,000
233	2/25/00	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$5,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
234	5/23/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE LANE	\$5,500
235	5/27/00	Belle Haven, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$5,500
236	5/30/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE MINER	\$5,600
237	5/31/00	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$3,500
238	05/31/00	Norfolk, VA	Gardena, Ca	FREDERICKS DOWNIE RIDDICK	\$3,500
239	6/6/00 18:45 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
240	6/6/00 19:06 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
241	6/7/00 14:30 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$4,000
242	6/7/00 15:32hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$4,000
243	7/8/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
244	7/17/00 17:16 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
245	7/17/00 17:52 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$7,000
246	7/19/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE MINER	\$5,700
247	7/26/00 16:48 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE LANE	\$5,000
248	7/26/00 17:19 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE DEERING	\$5,000
249	7/29/00 14:43 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
250	7/29/00 15:06 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE MINER	\$5,000
251	8/5/00 16:08 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
252	8/5/00 17:20 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
253	9/5/00 12:45 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,500
254	9/5/00 13:13 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,500
255	9/7/00 17:09 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
256	9/7/00 17:45 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE	\$6,000
257	9/11/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,700
258	9/29/00 16:53 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE	\$1,800
259	9/29/00 16:39 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$2,250
260	10/3/00 17:05 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
261	10/3/00 17:42 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
262	10/12/00	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$6,000
263	10/19/00 17:45 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
264	10/19/00 18:23 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
265	11/2/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$2,000
266	11/8/00	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
267	11/8/00	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
268	11/17/00	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
269	11/22/00	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$7,000
270	11/28/00 12:59 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
271	11/28/00 13:57 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$6,000
272	12/6/00	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$6,000
273	12/7/00	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$5,000
274	12/12/00 19:05 hrs EST	Exmore, VA	Gardena, CA	FREDERICKS DOWNIE LANE	\$6,000
275	12/12/00 20:07 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$5,914
276	12/13/00	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$6,000
277	12/14/00	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000



Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
278	1/9/01 19:40 hrs EST	Exmore, VA	Gardena, CA	FREDERICKS DOWNIE LANE	\$6,000
279	1/9/01 20:30 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
280	1/10/01	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
281	1/10/01	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$4,500
282	1/18/01 11:21 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$5,000
283	1/18/01 13:53 hrs EST	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$6,000
284	1/18/01 14:43 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$6,000
285	1/19/01	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$4,500
286	1/24/01	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$6,000
287	1/24/01	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
288	1/25/01	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
289	1/30/01	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$4,000
290	2/28/01 20:32 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
291	2/28/01 20:38 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DEERING	\$6,000
292	3/1/01 11:10 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,500
293	3/1/01 12:36 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE OSBOURNE	\$5,500
294	3/1/01 13:11 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
295	3/6/01 10:36 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$6,000
296	3/6/01 11:36 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE DEERING	\$6,000
297	3/6/01 12:09 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
298	3/6/01 14:59 hrs EST	Chesa- peake, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$3,500
299	3/15/01 10:11 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
300	3/15/01 10:51 hrs EST	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$2,750
301	3/15/01 12:24 hrs EST	Virginia Beach, VA	Gardena, CA	FREDERICKS DOWNIE DENNIS	\$7,000
302	4/12/01	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE OSBOURNE	\$2,000
303	4/21/01	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$5,600
304	04/25/01 11:08 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE OSBOURNE	\$6,000
305	04/25/01 11:51 hrs EST	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE OSBOURNE DENNIS	\$6,000
306	4/25/01 12:48 hrs EST	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$3,340
307	5/3/01	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$1,800
308	5/18/01	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$2,000
309	6/5/01	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE DEERING	\$3,300
310	8/16/01 19:20 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
311	8/16/01 10:35 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
312	8/16/01 11:04 hrs EST	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE DENNIS	\$5,000
313	8/16/01 11:40 hrs EST	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE	\$3,500
314	8/16/01	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$2,500
315	8/23/01 10:00 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$6,000
316	08/23/01 10:23 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
317	08/23/01 10:26 hrs EST	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE DENNIS	\$5,000
318	08/23/01 11:02 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
319	08/23/01 14:01 hrs EST	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE LANE	\$3,500
320	08/30/01 10:05 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$6,000
321	08/30/01 10:32 hrs EST	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE DENNIS	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
322	08/30/01 10:54 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
323	8/30/01 12:45 hrs EST	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$6,000
324	10/25/01	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE LANE	\$6,000
325	10/26/01 20:02 hrs EST	Norfolk, Virginia	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
326	10/26/01 20:45 hrs EST	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
327	10/30/01 13:24 hrs EST	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
328	1/10/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE	\$2,000
329	1/10/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
330	1/14/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$6,000
331	1/14/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE	\$5,700
332	1/17/02	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE BENJAMIN	\$5,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
333	1/20/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
334	1/20/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE MINER	\$6,000
335	1/21/02	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE	\$6,000
336	1/21/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE RIDDICK	\$1,575
337	1/24/02	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE WALLER	\$6,000
338	1/24/02	Virginia Beach, VA	Bellflower, CA	DOWNIE FREDERICKS	\$2,300
339	1/24/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE MINER RIDDICK	\$6,000
340	1/24/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE MINER	\$6,000
341	1/28/02	Virginia Beach, VA	Bellflower, CA	FREDERICKS DOWNIE HENRY	\$6,000
342	1/30/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
343	1/31/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE WALLER	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
344	1/31/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
345	1/31/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE DENNIS	\$6,000
346	1/31/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$4,200
347	2/2/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE WALLER	\$6,000
348	2/3/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$6,000
349	2/3/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
350	2/4/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,000
351	2/5/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,050
352	2/7/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE WALLER	\$6,000
353	2/7/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
354	2/7/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
355	2/7/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
356	2/11/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$4,500
357	2/16/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE WALLER	\$6,000
358	2/16/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
359	2/16/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,000
360	2/18/02	Norfolk, VA	Bellflower, CA	FREDERICKS DOWNIE LANE	\$3,000
361	2/18/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$6,000
362	2/18/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
363	2/19/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
364	2/19/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$6,000
365	2/23/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000



Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
366	2/23/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE WALLER	\$6,000
367	2/25/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$6,000
368	2/25/02	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE BENJAMIN	\$5,650
369	2/27/02	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
370	2/27/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$6,000
371	2/27/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNEY WALLER	\$6,000
372	2/27/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,000
373	2/28/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
374	2/28/02	Virginia Beach, VA	Los Angeles, CA	FREDERICKS DOWNIE SANDERLIN	\$6,000
375	3/11/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,000
376	3/11/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
377	3/12/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
378	3/14/02	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE	\$6,000
379	3/15/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$6,000
380	3/18/02	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE	\$2,200
381	3/19/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
382	3/19/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE HENRY	\$6,000
383	3/19/02	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE BENJAMIN	\$2,900
384	3/19/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$6,000
385	3/23/02	Virginia Beach, VA	Los Angeles, CA	FREDERICKS DOWNIE HENRY	\$6,000
386	3/23/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$6,000
387	3/23/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
388	3/23/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE LANE	\$6,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
389	3/23/02	Chesapeake, VA	Downey, CA	FREDERICKS DOWNIE MINER	\$6,000
390	3/25/02	Norfolk, VA	Los Angeles, CA	FREDERICKS DOWNIE	\$2,600
391	4/9/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE BENJAMIN	\$6,000
392	4/10/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$5,250
393	4/10/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$6,000
394	4/23/02	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE MINER	\$5,000
395	4/23/02	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
396	4/23/02	Norfolk, VA	Gardena, CA	FREDERICKS DOWNIE BENJAMIN	\$2,950
397	4/23/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$5,000
398	4/25/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE	\$3,550
399	4/29/02	Norfolk, VA	Downey, CA	FREDERICKS DOWNIE RIDDICK	\$5,000
400	4/29/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE SANDERLIN	\$5,000

Count	Date Money Wired	Location Money Wired	Location Money Collected	Defendants Charged	Approximate Money Wired or Sent
401	4/29/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE MINER	\$5,000
402	4/29/02	Virginia Beach, VA	Downey, CA	FREDERICKS DOWNIE WALLER	\$3,650
Total wired in 185 Counts					\$960,329

(All in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2).

CRIMINAL FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

A. The following 27 defendants:

EARL ADOLPHUS ALLEYNE,  
STANFORD LYNDEN ARTHUR,  
MARLON BENJAMIN a/k/a "Rapid",  
KEVIN MARCEL BOONE, a/k/a "Neighbor",  
KAREN ELIZABETH BUCKNOR, a/k/a "Buckers",  
SIMEON GARGGON CHARLES, a/k/a "Lion",  
STEPHANIE ANTOINETTE DEERING,  
JANE DOE ONE, a/k/a "Vimalam Delaney", "V", and "Vimalam Lakami Ananda  
Hamilton-Delaney",  
ANTHONY DELGADO,  
SEQUOYA MARY DENNIS, a/k/a "Pumpkin",  
ANDREW PAUL DOWNIE a/k/a "UPS", "Phillip Richard Gayle", and "Todd",  
JULIUS NIGEL FREDERICKS, a/k/a "Mike Williams" and "Mike Francis",  
OMAR LEE GRANT,  
MARLO ANNE HENRY,  
STANLEY ALPHONZO HURT,  
TONDA ANN JAMES,  
ANNETTE PATRICE LANE,  
NICOLE R. MINER,  
AUTHORO OSMOND OSBOURNE, a/k/a "Tall Man Johnny", "Author Osbourne", and  
"Johnny-Nine",  
KENYA PRINCE CHUNCEY PURNELL, a/k/a "Moses",  
BARBARA LAVETTE RIDDICK, a/k/a "Barbie Lavette Riddick" and "Lynette",  
NAKIA KENYATA SANDERLIN,  
CASEY RICARDO SERVICE, a/k/a "Dooka" and "Ricky",  
SHAUN ALISTER TYSON,  
SHEILA WALLER,  
LAWANDA MARIE WHITE, and  
ANTONIO JERMAINE WYATT, a/k/a "Tone",

if convicted of any one of the violations alleged in Counts One through Four Hundred of this Indictment, shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violations;
2. Any of the defendants property used, or intended to be used, in any manner

or part, to commit, or to facilitate the commission of such violations; and

3. Any of the defendants interest in, claims against, and property or contractual rights affording a source of control over, the continuing criminal enterprise.

(All in violation of Title 21, United States Code, Section 853)

4. Any and all property, real or personal, involved in such offense; and

5. Any and all property traceable to such property, in whole or in part, in such offense.

(All in violation of Title 18, United States Code, Section 982)

C. The property subject to forfeiture under paragraphs A and B includes but is not limited to the following: the sum of \$2,784,758, equal to the approximate gross proceeds involved in the drug and money laundering crimes.

D. If any property that is subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been place beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendants, up to the value described above, as subject to forfeiture under Title 21, United States Code, Section 853p.

A TRUE BILL:

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FOREPERSON

PAUL J. MCNULTY  
UNITED STATES ATTORNEY

By: \_\_\_\_\_  
Kevin M. Comstock  
Assistant United States Attorney

By: \_\_\_\_\_  
Raymond E. Patricco, Jr.  
Assistant United States Attorney